

REMARKS

Claims 1-19 are pending. By this Amendment, claims 1 and 12 are amended. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

The Office Action objects to the specification for a number of informalities. Again, regarding the Appendices, Applicants are currently reviewing the best approach to have this subject matter included in the specification. Accordingly, Applicants respectfully request that this objection be held in abeyance until the indication of allowable subject matter.

Initially, on page 3 of the Office Action, claims 1-4, 7-17 and 19 are rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office Action indicates that adequate support for “the request message being verified to ensure valid formatting and appropriate parameters for the customer specific data” has not been provided. In response thereto, Applicants respectfully traverse this rejection. Applicants submit that adequate written description of this feature is evident starting on page 90 of the specification. However, in order to expedite prosecution, Applicants have removed the phrase “and appropriate parameters for the customer specific data.” Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection.

On page 4 of the Office Action, claims 1-4, 7-17 and 19 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 5,958,016 to Chang et al. (hereinafter “Chang”) in view of U.S. Patent No. 5,825,769 to O’Reilly (hereinafter “O’Reilly”). This rejection is respectfully traversed.

Claim 1 recites, *inter alia*, ... a requestor application enabling the customer to communicate a data report request message via said integrated interface to the report manager server, the request message being verified to ensure valid formatting,... said customer-specific retrieved data and said metadata description of said reporting items are communicated to said client workstation and utilized to generate a completed report for presentation to said customer, the completed report capable of being dynamically determined based on the metadata and one or more of customization options and user options.

Similarly, claim 12 recites, *inter alia*, ... generating a corresponding response message including a metadata description of said reporting items for a requested report; verifying the request message to ensure valid formatting,... generating a completed report for

said customer from said metadata description of said reporting items and said retrieved said customer-specific data via said integrated interface, the completed report capable of being dynamically determined based on the metadata and one or more of customization options and user options.

Applicants however respectfully submit that neither the Chang nor O'Reilly patents teach or suggest a "request message comprising a metadata description of particular reporting items to be retrieved..." as recited in claim 1 or "generating a corresponding response message including a metadata description of said reporting items for a requested report..." as recited in independent claim 12.

The Office Action indicates that Chang teaches that a user can enter a request by clicking on text or icons or sending typed inputs to a server, and that this meets the language of the claims since the text, icons or typed inputs would be data that describes a type of data desired by the user. Support for the Examiner's position is provided in several areas of the Chang specification. For example, column 7, lines 5-12, states as follows:

Several vendors also now offer a 'Web-TV' terminal device for coupling to a television set, to provide web browsing and other Internet services using a remote control and a television screen. While viewing pages using either type of terminal, the user can enter requests by clicking on text or icons or can send typed inputs to a server....

Applicants, however, submit that this excerpt of Chang only indicates that requests can be initiated by clicking icons or sending typed inputs to a server. Applicants further point out that an icon is merely a pointer to a location in memory where a command or set of commands is located. Thus, Applicants submit that there is no teaching of request messages that include metadata descriptions of particular reporting items to be received, as recited in claim 1 or metadata description of said reporting items for a requested report, as recited in claim 12. The Office Action provides further support for the rejection in column 20, lines 39-46, which states as follows:

The proxy server 523 transmits that page to the subscriber's terminal device 29 through the router 510 and the public packet switched data network 27. The terminal 29 presents the HTML page as a template with one or more boxes for the user to fill in with the necessary information. The subscriber inputs the requested further information on the page, and the terminal device transmits the information as an HTTP message through the Internet 27 for verification;

Applicants submit that this excerpt appears to indicate that the user can input data for transmission via the Internet. However, Applicants submit that there is, again, no teaching of the use of metadata descriptions of particular reporting items to be received, as recited in claim 1 or metadata description of said reporting items for a requested report, as recited in claim 12.

The Office Action provides additional support for the rejection in column 21, lines 4-10 which states:

The subscriber also can type in specific detailed information in fields of the service control template(s). When the subscriber completes any such input, the browser 293 in the terminal 29 transmits the input information back through the Internet 27 to the proxy server 523. If the input information is 'legal,' the proxy server 523 forwards the information in appropriate form to the application server 527;

This excerpt again only appears to show that the user can input data for transmission via the Internet and that there is some sort of verification of the data. However, Applicants again submit that there is no teaching of the use of metadata descriptions of particular reporting items to be received as recited in claim 1 or metadata description of said reporting items for a requested report as recited in claim 12.

The Office Action provides additional support for the rejection in column 23, lines 10-15 which states:

In response to other inputs from the subscriber, the WSMS 255 also collects service reporting information relating to switch based features. The WSMS may collect AMA records or station message detail recording (SMDR) reports. In the illustrated example, the WSMS 255 communicates through the OSN 21 with the Revenue Accounting Office (RAO) 235, to obtain information relating to a customer's billing account.

Once again, Applicants submit that this excerpt only shows that the user can input data for transmission via the Internet and that there is some sort of verification that takes place. Again, there is no teaching of the use of metadata descriptions of particular reporting items to be received as recited in claim 1 or metadata description of said reporting items for a requested report as recited in claim 12.

The passages cited by the Examiner, do not, in any way, disclose or suggest the use of the claimed metadata descriptions. In fact, the Examiner appears to merely rely on two unrelated facts: 1) the dictionary definition of metadata (which is not mentioned in either the Chang or O'Reilly references), and 2) the fact that requests are sent in various manners as described in Chang. The Examiner attempts to relate these two abstract facts by stating that the actuation of an icon or the typing of input represents metadata. However, as disclosed above, the Chang reference, in no way, supports the Examiner's assumption since metadata is not sent when an icon is actuated or a typed input is entered. Thus, Applicants respectfully submit that the Examiner has not provided **any** support for the argument that these messages include metadata descriptions of the reports to be sent. There is no support, either within the references themselves or within the definition of metadata, for such a conclusion. Thus, Applicants respectfully request further explanation of this aspect of the rejection or reconsideration and withdrawal of the rejection.

Furthermore, Applicants submit that neither the Chang nor O'Reilly references disclose or suggest the completed report capable of being dynamically determined based on the metadata and one or more of customization options and user options as recited in independent claims 1 and 12. Applicants respectfully submit that since, as argued above, metadata is not disclosed in Chang or O'Reilly that the completed report capable of being dynamically determined based on the metadata and one or more of customization options and user options, is also not disclosed. Thus, Applicants respectfully request reconsideration and withdrawal of the rejection.

Accordingly, Applicants respectfully submit the cited references either alone or in combination fail to teach, suggest or disclose each and every aspect of claims 1 and 12. Furthermore, Applicants respectfully submit that the remainder of the claims which depend directly or indirectly from claims 1 and 12 are also not obvious in view of the cited references for at least the reasons outlined above and the additional feature(s) they recite. Withdrawal of the rejection of claims 1-4, 7-17 and 19 under 35 U.S.C. §103(a) is respectfully requested.

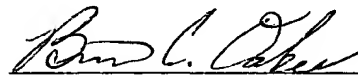
The Office Action rejects claims 5-6 and 18 under 35 U.S.C. §103(a) as unpatentable over Chang and O'Reilly and further in view of U.S. Patent No. 6,240,450 to Sharples et al (hereinafter "Sharples"). This rejection is respectfully traversed.

Applicants respectfully submit that Sharples at least fails to overcome the deficiencies noted above in relation to Chang and O'Reilly. Accordingly, Applicants respectfully submit that the cited references either alone or in combination, fail to teach, suggest or disclose each and every aspect of the claims. Accordingly, the cited references fail to render obvious claims 5-6 and 18. Withdrawal of the rejection of claims 5-6 and 18 under 35 U.S.C. §103(a) is respectfully requested.

Applicants respectfully submit that the application is in condition for allowance. Favorable reconsideration and prompt allowance are respectfully requested.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



Brian C. Oakes
Registration No. 41,467

BCO

NIXON PEABODY LLP
401 9th Street, NW, Suite 900
Washington, DC 20004-2128
Telephone: (202) 585-8000
Facsimile: (202) 585-8080